3/3/99

K984388

SUMMARY OF SAFETY AND EFFECTIVENESS

Applicant:	ConvaTec, A Division of E.R. Squibb and Sons, Inc. 100 Headquarters Park Drive, Skillman, NJ 08558
Contact:	Adrienne McNally, Director, Regulatory Affairs (908) 904-2630
Device:	HA Absorbent Wound Dressing
Substantially Equivalent Device	FIBRACOL Collagen-Alginate Wound Dressing Knitted Wound Dressing

The purpose of this 510(k) Premarket Notification is to request clearance to market HA Absorbent Wound Dressing.

HA Absorbent Wound Dressing is an absorbent fibrous fleece (F) or rope (R), entirely composed of HYAFF 11p75™, a benzyl ester of hyaluronic acid.

For over-the-counter use, HA Absorbent Wound Dressing-F may be used for wounds such as: abrasions, lacerations, minor cuts and first degree burns. Under the supervision of a healthcare professional, HA Absorbent Wound Dressing-F may be used for wounds such as: leg ulcers, pressure ulcers (stages I-IV), and diabetic ulcers; surgical wounds (post-operative, donor sites, dermatological), second degree burns; management of wounds that are prone to bleeding such as wounds that have been mechanically or surgically debrided, donor sites, and traumatic wounds.

HA Absorbent Wound Dressing-R is indicated for use in the management of deep exuding wounds, sinuses, and fistulae.

HA Absorbent Wound Dressing is contraindicated for use on patients with known sensitivity to the dressing or its components.

HA Absorbent Wound Dressing is substantially equivalent to FIBRACOL Collagen-Alginate Wound Dressing and Knittted Wound Dressing (Ribbon). HA Absorbent Wound Dressing-F is equivalent to FIBRACOL Collagen-Alginate Wound Dressing where both are of a biopolymer composition, absorb wound exudate, and create a moist wound environment supportive of the healing process.
HA Absorbent Wound Dressing-R (Rope) is equivalent to Knitted Wound Dressing (Ribbon) where both are indicated for deep exuding wounds, sinuses and fistulae.

HA Absorbent Wound Dressing has been subject to biocompatibility testing. The results of this testing show that Hyalofill Absorbent Wound Dressing has passed toxicity tests and is considered to be non-toxic, non-hemolytic, a negligible irritant, non-cytotoxic, and has shown to have 0% sensitization potential.

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

MAR - 3 1999

Ms. Adrienne McNally
Director, Regulatory Affairs
ConvaTec
100 Headquarters Park Drive
Skillman, New Jersey 08558

Re: K984388
Trade Name: HA Absorbent Wound Dressing
Regulatory Class: Unclassified
Product Code: KMF
Dated: December 4, 1998
Received: December 8, 1998

Dear Ms. McNally:

We have reviewed your Section 510(k) notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (the Act). You may, therefore, market your device subject to the general controls provisions of the Federal Food, Drug, and Cosmetic Act (Act) and the following limitations:

1. This device may not be labeled for use on third degree burns.

2. This device may not be labeled as having any accelerating effect on the rate of wound healing or epithelization.

3. This device may not be labeled as a long-term, permanent, or no-change dressing, or as an artificial (synthetic) skin.

4. This device may not be labeled as a treatment or a cure for any type of wound.

The labeling claims listed above would be considered a major modification in the intended use of the device and would require a premarket notification submission (21 CFR 807.81).

The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practices, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (Premarket Approval) it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations (CFR), Title 21, Parts 800 to 895. A substantially equivalent determination assumes compliance with the Good Manufacturing Practices (GMP) for Medical Devices: General GMP regulation (21 CFR Part 820) and that, through periodic GMP inspections, the Food and Drug Administration (FDA) will verify such assumptions. Failure to comply with the GMP regulation may result in regulatory action. In addition, FDA may publish further announcements concerning your device in the Federal Register. Please note: this response to your premarket notification submission does not affect any obligation you might have under sections 531 through 542 of the Act for devices under the Electronic Product Radiation Control provisions, or other Federal laws or regulations.

This letter will allow you to begin marketing your device as described in your 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4595. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers Assistance at its toll-free number (800) 638-2041 or 301-443-6597 or at its internet address http://www.fda.gov/cdrh/dsmamain.html.

Sincerely yours,

Celia M. Witten, Ph.D., M.D.
Director
Division of General and
Restorative Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

INDICATIONS FOR USE STATEMENT

510(k) Number (if known): ~~Not Known~~ K984388

Device Name: HA Absorbent Wound Dressing

Indications for Use:

For over-the-counter use, HA Absorbent Wound Dressing-F may be used for wounds such as: abrasions, lacerations, minor cuts and first degree burns. Under the supervision of a healthcare professional, HA Absorbent Wound Dressing-F may be used for wounds such as: leg ulcers, pressure ulcers (stages I-IV), and diabetic ulcers; surgical wounds (post-operative, donor sites, dermatological), second degree burns; management of wounds that are prone to bleeding such as wounds that have been mechanically or surgically debrided, donor sites, and traumatic wounds.

HA Absorbent Wound Dressing-R is indicated for use in the management of deep exuding wounds, sinuses, and fistulae.

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

NRO

(Division Sign-Off)
Division of General Restorative Devices
510(k) Number K984388

Prescription Use X
(Per 21 CFR 801.109)

OR

Over-the-Counter Use X
(Optimal Formate 1-2-96)